

4WD-WPB

MEMORANDUM

DATE:

SUBJECT: File Review of North Carolina CERCLA Site Assessment Files

FROM: Robert Morris *RM*
North Unit, Site Assessment Section
Waste Program Branch

TO: Site File
Detrex Chemical Industries, Inc.
NCD049773245

As a result of the CERCLA file review on the State of North Carolina Site Assessment Files completed on 08/21/89, and through subsequent consultation with North Carolina Department of Environment Health and Natural Resources personnel, it was determined that Detrex Chemical Industries, Inc., NCD049773245, was a RCRA TSD facility. Because of the RCRA status of this site, no further remedial action is currently planned under CERCLA authorities.

cc: Pat DeRosa, NCDEHNR

Document Name: RCRA TSD Page 6

-2

THE FOLLOWING SITES ARE RCRA FACILITIES (THEREFORE, CERCLA NFRAP'S) AS OF AUGUST 21, 1989:

REF. NO.	ID NO.	SITE NAME
2782	NCD049773245	DETREX CHEMICAL INDUSTRIES INC
2772	NCD047369046	DUPONT, EI DE NUMOURS & CO. CAPE FEAR
2622	NCD003173358	DURABLE WOOD PRESERVERS INC
3155	NCD991278524	ENVIRONMENTAL RECYCLING CO.
2732	NCD041043811	FIBER INDUSTRIES INC
2597	NCD003149292	GASTON CO DYEING MACHINE CO
2787	NCD050409150	GENL ELEC CO
2876	NCD072018252	GENL ELEC MED STEAM TURBINE PROD DEPT
2724	NCD024900987	HOLCOMB CREOSOTE CO
2550	NCD000771964	LITHIUM CORP OF AMERICA CHEMICAL PLT
2927	NCD085438810	MILLER BREWING CO
3147	NCD991277856	NCDA PESTICIDE LAB STORAGE FACILITY
2556	NCD000773655	OLDOVER CORP
2585	NCD000831065	PHOTO CHEMICAL SYSTEMS INC
2741	NCD042091975	RJR TECH CO
2895	NCD079060059	SAFETY KLEEN CORP
2559	NCD000776740	SAFETY - KLEEN 3-171-01
2892	NCD077840148	SAFETY - KLEEN CORP 3-064-01
2558	NCD000776732	SAFETY - KLEEN CORP. 3-031-02
2916	NCD083673681	SINGER CO - KERAFOOT DIV
2875	NCD072012354	SINGER CO. FURNITURE DIV. WASHINGTON
2939	NCD091249417	TEXTRON INC HOMELITE DIV
2627	NCD003184520	WEST POINT PEPPERELL HAMILTON
2654	NCD003213907	WESTERN ELEC CO INC LEX RD PLT

THE FOLLOWING SITES ARE ALSO LISTED AS NFRAP SITES (AS PER POS' FILE REVIEW OF AUGUST 21, 1989):

REF. NO.	ID NO.	SITE NAME
3041	NCD980557946	FAIRVIEW LDFL
2675	NCD003230083	FANCOURT W F CO
2567	NCD000813683	GA-PACIFIC CORP CHIP-N-SAW
2964	NCD097724306	GA-PACIFIC CORP CHIP-N-SAW
2565	NCD000813659	GA-PACIFIC CORP COMPLY
3060	NCD980559967	GA-PACIFIC CORP HDWD SAW
2562	NCD000813543	GA-PACIFIC CORP PANELBOARD
2566	NCD000813667	GA-PACIFIC CORP PLYWOOD
2669	NCD003225620	HIGH POINT FURNITURE INDUSTRIES
2573	NCD000828244	KINGS MOUNTAIN PILOT CREEK WWTP
2956	NCD095119210	MCGRAW EDISON CO
3054	NCD980559330	NASH CO LDFL
3055	NCD980559348	NASH CO LDFL
3056	NCD980559355	NASH CO LDFL
2533	NCD000616466	REYNOLDS RJ TOBACCO CO
2867	NCD071561864	SHERWIN WILLIAMS CO
3057	NCD980559389	TARBORO LDFL
3153	NCD991278300	UNITED DRUM T/A RELIANCE UNIVERSAL
3146	NCD991277807	WOOLFOLK CHEM WRKS WENDELL WHS

4WD-WPB

MEMORANDUM

DATE: 7/9/90

SUBJECT: File Review of North Carolina CERCLA Site Assessment Files

FROM: Susan Deihl, Chief
North Unit, Site Assessment Section
Waste Program Branch

TO: Syed Ahmed, Acting Chief
Waste Engineering Section (NC/SC)
RCRA and Federal Facilities Branch

This is to inform you that as a result of the CERCLA file review on the State of North Carolina Site Assessment Files completed on 8/21/89, and through subsequent consultation with North Carolina Department of Environment Health and Natural Resources personnel, it was determined that **Detrex Chemical Industries, Inc.**, NCD049773245, NCD042892067, was a RCRA TSD facility. Because of the RCRA status of this site, no further remedial action is currently planned under CERCLA authorities.

However, if you determine that the RCRA status of this site has changed, or if the RCRA responsible party is unwilling or unable to pay for necessary corrective action, please inform us and we will reactivate our investigation of the site.

cc: Pat Rosa, NCDEHNR
Site File

Document Name: RCRA TSD Page 5

4WD-WPB

MEMORANDUM

DATE:

SUBJECT: File Review of North Carolina CERCLA Site Assessment Files

FROM: Robert Morris
North Unit, Site Assessment Section
Waste Program Branch

TO: Site File
Detrex Chemical Industries, Inc.
NCD049773245

As a result of the CERCLA file review on the State of North Carolina Site Assessment Files completed on 08/21/89, and through subsequent consultation with North Carolina Department of Environment Health and Natural Resources personnel, it was determined that **Detrex Chemical Industries, Inc., NCD047369046**, was a RCRA TSD facility. Because of the RCRA status of this site, no further remedial action is currently planned under CERCLA authorities.

cc: Pat DeRosa, NCDEHNR

Document Name: RCRA TSD Page 6

REGION: 04
STATE : NC

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 558
RUN DATE: 85/09/16
RUN TIME: 09:10:46

M.2 - SITE MAINTENANCE FORM

EPA ID:	NCD049773245			* ACTION: _	*				
SITE NAME:	DETREX CHEMICAL INDUSTRIES INC	SOURCE:	H	* _____	*				
STREET:	3114 CULLMAN	CONG DIST:	09	* _____	*				
CITY:	CHARLOTTE	ZIP:	28206	* _____	*				
CNTY NAME:	MECKLENBURG	CNTY CODE:	119	* _____	*				
LATITUDE:	35/15/00.0	LONGITUDE:	080/48/45.0	* ____/____/____	*				
SMSA:	1520	HYDRO UNIT:	03050103	* _____	*				
INVENTORY IND:	Y	REMEDIAL IND:	Y	REMOVAL IND:	N	FED FAC IND:	N	* _____	*
NPL IND:	N	NPL LISTING DATE:		NPL DELISTING DATE:		* ____/____/____	*		
APPROACH:		SITE CLASS:		* _____	*				
SITE/SPILL IDS:				* _____	*				
RPM NAME:		RPM PHONE:	- -	* _____	*				
DIOXIN TIER:		REG FLD1:		REG FLD2:	2	* _____	*		
RESP TERM:	PENDING ()	NO FURTHER ACTION ()		* PENDING ()	NO FURTHER ACTION ()	*			
= DISP:		NO VIABLE RESP PARTY ()	VOLUNTARY RESPONSE ()	* _ _	*				
		ENFORCED RESPONSE ()	COST RECOVERY ()	* _ _	*				
SITE DESCRIPTION:				* _____	*				
				* _____	*				
				* _____	*				
				* _____	*				

REGION: 04
STATE : NC

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 559
RUN DATE: 85/09/16
RUN TIME: 09:10:46

M.2 - PROGRAM MAINTENANCE FORM

SITE: DETREX CHEMICAL INDUSTRIES INC

EPA ID: NCD049773245 PROGRAM CODE: H01 PROGRAM TYPE:

PROGRAM QUALIFIER: ALIAS LINK :

PROGRAM NAME: SITE EVALUATION

DESCRIPTION:

* ACTION: _

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REGION: 04
STATE : NC

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 560
RUN DATE: 85/09/16
RUN TIME: 09:10:46

M.2 - EVENT MAINTENANCE FORM

* ACTION: _

SITE: DETREX CHEMICAL INDUSTRIES INC
PROGRAM: SITE EVALUATION

EPA ID: NCD049773245 PROGRAM CODE: H01 EVENT TYPE: DS1

IS CODE: EVENT QUALIFIER: EVENT LEAD: E

EVENT NAME: DISCOVERY STATUS:

DESCRIPTION:

* _ _ _ _ _ *

* _ _ _ _ _ *

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* _ _ _ _ _ *

ORIGINAL

CURRENT

ACTUAL

START: START: START:
COMP : COMP : COMP : 80/07/01

* _/_/_/_ _/_/_/_ _/_/_/_ *

* _/_/_/_ _/_/_/_ _/_/_/_ *

HQ COMMENT:

* _ _ _ _ _ *

* _ _ _ _ _ *

RG COMMENT:

COOP AGR # AMENDMENT # STATUS STATE %

* _ _ _ _ _ *

REGION: 04
STATE : NC

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 561
RUN DATE: 85/09/16
RUN TIME: 09:10:46

M.2 - EVENT MAINTENANCE FORM

* ACTION: _

SITE: DETREX CHEMICAL INDUSTRIES INC
PROGRAM: SITE EVALUATION

EPA ID: NCD049773245 PROGRAM CODE: H01 EVENT TYPE: PA1

IS CODE: EVENT QUALIFIER: EVENT LEAD: S

EVENT NAME: PRELIMINARY ASSESSMENT STATUS:

DESCRIPTION:

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ORIGINAL	CURRENT	ACTUAL
START:	START:	START:
COMP :	COMP :	COMP : 85/09/12

* _/_/_/_ _/_/_/_ _/_/_/_ *

* _/_/_/_ _/_/_/_ _/_/_/_ *

HQ COMMENT:

* _ _ _ _ _ *

* _ _ _ _ _ *

RG COMMENT:

COOP AGR # AMENDMENT # STATUS STATE %

* _ _ _ _ _ *



North Carolina Department of Human Resources

Division of Health Services

P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
Philip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

8 August 1985

Ms. Denise Bland
EPA NC CERCLA Project Officer
Air and Hazardous Material Division
345 Courtland Street, N.E.
Atlanta, GA 30365

SUBJECT: Final Preliminary Assessment Report
Detrex Chemical Industries, Inc. NC D049773245
3114 Cullman Avenue
Charlotte, NC 28206

Dear Ms. Bland:

Enclosed please find the Preliminary Assessment report for the subject site. This priority is based on our review of available data, and, sometimes, on conversations and correspondence with the site owner and operator. We have concluded that:

Detrex Chemical Industries Inc. is located on a site of slightly less than one acre in the city of Charlotte, N.C. at 3114 Cullman Ave. and has been in continuous operation since 1969. It is owned and operated by Detrex Chemical Industries Inc., P.O. Box 501, Detroit, Michigan 48232. The production process consists of warehousing and distributing industrial solvents. As a service to their customers, they pick up drums of spent halogenated solvents (E001), transport these into the Detrex warehouse, and distill off the good solvents for resale. The spent solvents are received in 55 gallon drums and transferred to 1000 gallon storage tanks in the warehouse within days. The still is operated about 4-5 days a month, as it has been since 1969, to recover the good solvent. The still and all spent solvent tanks are inside the warehouse. Recovered solvents are pumped directly from the still to outside storage tanks in a diked, concrete lined container area. The hazardous waste stillbottoms are then transported off site by the M & T Drum Service Co. of Huntersville, N.C. to the EPA approved hazardous waste disposal sites of Chemical Waste Management of Emelle, Ala., and to GSX of Pinewood South Carolina. This has been done continuously since 1969.

The hazardous materials are toxic. The types are: (U226)
1,1,1-Trichloroethane, (U210) Perchloroethylene, and (U228) Trichloroethylene.

The amount of the recovered halogenated solvents (F001) was approximately 100,000lbs annually since 1969, and the amount of stillbottoms (F002) was 25,000 lbs. annually since 1969. The recovered solvents were then sold as industrial solvents, and the waste from stillbottoms was then shipped off site to the EPA approved sites at Chemical Waste Management Inc. of Emelle, Ala. and to CSX of Pinewood S.C. Transportation of the hazardous waste was, and still is, by the M & T Drum Service Co., of Huntersville, N. C.

The hazardous conditions are very limited, and are only from the emptying of 55 gallon drums into the 1000 gallon storage tanks inside the warehouse. Spillage is minimal, and when it occurs, it is cleaned up immediately by squeegeeing into a pan and back into the storage tank. There is no evidence of spillage into the environment since 1969.

The possible routes for contamination since 1969 are from groundwater or from surface runoff water. They are negated by containment and collection of these very tiny spills. The outside tanks, however, do have a stronger possibility for leakage, and absorption of leaked waste could move into the groundwater, although this reportedly has never happened. These are the only possible routes of contamination, due to the nature of the production and disposal processes, which have not changed since 1969. Groundwater is potentially affected, but there are no known groundwater users within the area of potential contamination.

The site is in the city of Charlotte, N.C. in a built-up area zoned for industrial use. and is served by the Charlotte Municipal Water and Sewage Treatment systems. There are no known wells for several miles in any direction, nor are there any wildlife refuges around.

This is a tightly contained production process, unchanged since 1969, within a warehouse, and outside storage in a diked, concrete lined containment area. The hazardous waste from stillbottoms is pumped out of a storage tank into 55 gallon drums, and shipped off site by an EPA certified transporter to an EPA certified hazardous waste disposal site. Because of this process, a low priority for inspection is recommended. This is a production, transportation, and disposal process that has remained the same since Detrex Chemical Industries Inc. began operations in 1969.

This conclusion is based upon a study of the information given in the U. S. EPA Part "A" Permit application dated 9/22/81, a RCRA inspection report dated October. 8, 1981, a telephone conversation between Lawrence O. Lenz of the North Carolina Solid and Hazardous Waste Management Branch, Raleigh, N.C. and Mr. Mark Teal of Detrex Chemical Industries Inc., and consultation with Mr. Tom Karnoski of the North Carolina Solid and Hazardous Waste Management Branch in Raleigh, N. C.

On 1 August 1985, this Preliminary Assessment was reviewed by CERCLA Unit personnel and by the following representatives from the North Carolina Department of Natural Resources and Community Development, Division of Environmental Management: Faye Sweat, Groundwater Section; and Glen Ross, Air Quality Section.

If you have any questions, please call me at (919) 733-2178.

Sincerely,

A handwritten signature in cursive script that reads "Lawrence O. Lenz". The signature is written in dark ink and is positioned above the typed name.

Lawrence O'Neal Lenz
Waste Management Specialist
Solid and Hazardous Waste Management Branch
Environmental Health Section

LOL/tb/0190b



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE NC 02 SITE NUMBER D049773245

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Detrex Chemical Industries, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 3114 Cullman Avenue			
03 CITY Charlotte	04 STATE NC	05 ZIP CODE 28206	06 COUNTY Mecklenburg	07 COUNTY CODE 60	08 CONG DIST 9
09 COORDINATES LATITUDE 35° 15' N		LONGITUDE 80° 48' 45" W			

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take Hwy. 29 South to 36th Street in Charlotte, NC. At 36th street, turn left and go 2 blocks to Cullman Avenue and turn right. Detrex Inc. is the 3rd building from end of dead-end street, on the left.

III. RESPONSIBLE PARTIES

01 OWNER (If known) Detrex Chemical Industries, Inc.		02 STREET (Business, mailing, residential) P.O. Box 501			
03 CITY Detroit	04 STATE MI	05 ZIP CODE 48232	06 TELEPHONE NUMBER (313) 358-5800		
07 OPERATOR (If known and different from owner) Detrex Chemical Industries, Inc.		08 STREET (Business, mailing, residential) 3114 Cullman Avenue			
09 CITY Charlotte	10 STATE NC	11 ZIP CODE 28206	12 TELEPHONE NUMBER (704) 372-9280		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3001 DATE RECEIVED: 07/14/80 MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (RCRA 103 c) DATE RECEIVED: _____ MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 10/08/81 MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1969 BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Spent halogenated solvents (F001) from drums; stillbottoms (F002) as waste from distillation of (U226) 1,1,1-Trichloroethane, (U210) Perchloroethylene, and (U228) Trichloroethylene. From drums, transferred to 1,000 gal. storage tank and distilled

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

within a few days. Recovered solvents are pumped directly from the still to outside storage tank, in a diked containment area. Stillbottom (liquid) pumped to 4th tank in some area and then shipped off-site by M & T Drum Service to Chemical Waste Mgmt. in Enelle; Ala. and some to GSX, Pinewood, S.C. Recommended low priority inspection.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspect on time available basis) <input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Mr. Mark Teal		02 OF (Agency/Organization) Detrex Chemical Industries, Inc.		03 TELEPHONE NUMBER (704) 372-9280	
04 PERSON RESPONSIBLE FOR ASSESSMENT Lawrence O. Lenz	05 AGENCY DHR/DHS	06 ORGANIZATION S & HW Mgmt.	07 TELEPHONE NUMBER 919 733-2178	08 DATE 07/12/85 MONTH DAY YEAR	

DETREX CHEMICAL INDUSTRIES, INC.



P.O. BOX 501, DETROIT, MICHIGAN 48232

EXECUTIVE OFFICE

TELEPHONE (313) 358-5800

TWX 810-224-4756

September 23, 1981

EPA Region IV
RCRA Activities
345 Courtland N. E.
Atlanta, GA 30308

Gentlemen:

Enclosed is a revised Part A permit application for our facility at:

3114 Cullman Ave.
Charlotte, N. C. 28206

Two revisions are shown:

- 1) Tank storage has been substituted for drum storage - page 1 Form 3510-3.
- 2) The estimated annual quantity of waste has been increased - page 3 Form 3510-3.

Both of these changes are a result of an unexpected higher demand for our service than was anticipated when the original application was filed.

Should you have any questions, please contact me.

Sincerely,

W. G. Robrecht
Assistant Manager of Corporate Engineering

WGR:ss

Enclosure

CERTIFIED MAIL

cc: J. Hickman
R. Ossman
I. Shamiyeh
G. Wasył

000052
RECEIVED
EPA REGION IV
SEP 23 1981
DETROIT MI

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F N C D O 4 9 7 7 3 2 4 5	
II. POLLUTANT CHARACTERISTICS		GENERAL INSTRUCTIONS: If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.			
III. NAME OF FACILITY: 1 DETREX CHEMICAL INDUSTRIES, INC.		IV. FACILITY CONTACT: 2 ROBRECHT WILL ASST MGR ENG 313 358 5800			
V. FACILITY MAILING ADDRESS: 3 PO BOX 501 4 DETROIT MI 48232		VI. FACILITY LOCATION: 5 3114 CULLMAN AVE 6 CHARLOTTE NC 28206			

CONTINUED FROM THE FRONT

SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
2 8 6 9 (specify)										7 (specify)									
C. THIRD										D. FOURTH									
(specify)										(specify)									

OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?									
DETREX CHEMICAL INDUSTRIES INC										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE										3 1 3 3 5 8 5 8 0 0									

E. STREET OR P.O. BOX									
P O BOX 501									

F. CITY OR TOWN										G. STATE										H. ZIP CODE										IX. INDIAN LAND									
DETROIT										MI										4 8 2 3 2										Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
N										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
UI										(specify)									
C. RCRA (Hazardous Wastes)										F. OTHER (specify)									
RI										(specify)									

MAP

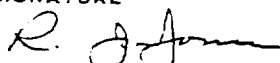
Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

WAREHOUSE AND DISTRIBUTION OF INDUSTRIAL SOLVENTS

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
R. J. JONES, VICE PRESIDENT																				9-22-81									

COMMENTS FOR OFFICIAL USE ONLY

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FORM 3
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permit Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F	N	C	D	0	4	9	7	7	3	2	4	5	3	1
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
8	6	10

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Dispose:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
1	2	1. AMOUNT (specify)	2. UNIT OF MEAS- URE (enter code)	1	2	1. AMOUNT	2. UNIT OF MEAS- URE (enter code)
X-1	S 0 2	600	G	5			
X-2	T 0 3	20	E	6			
1	S 0 2	14000	G	7			
2	T 0 4	1000	U	8			
3				9			
4				10			

2. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR INCLUDE DESIGN CAPACITY.

R DESCRIBING OTHER PROCESSES (code "T0

FOR EACH PROCESS ENTERED HERE

T04 - 1 Distill. unit - 1 @ 1000 GPD

IV. DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS. P
TONS. T

METRIC UNIT OF MEASURE CODE
KILOGRAMS. K
METRIC TONS. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03D80	
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY														
W N C D 0 4 9 7 7 3 2 4 5 3 1													W -- DUP -- 2 DUP														
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																											
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																							
				1. PROCESS CODES (enter)																							
				27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	F 0 0 1	100,000	P	S	0	2	T	0	4																		
2	F 0 0 2	25,000	P	S	0	2																					
3																											
4																											
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24																											
25																											
26																											

EPA I.D. NO. (enter from page 1)													
N	C	D	0	4	9	7	7	3	2	4	5	3	6

V. FACILITY DRAWING

For existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

For existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
3	5	1	5	0						8	0	4	8	4	5				
63	44	47	44	40	-	71				72	-	74	33	74	77				

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)																			
Detrex Chemical Industries, Inc.										3 1 3 - 3 5 8 - 5 8 0																			
3. STREET OR P.O. BOX										4. CITY OR TOWN										5. ST.					6. ZIP CODE				
P. O. Box 501										Detroit										MI					4 8 2 3 2				

IX. OWNER CERTIFICATION

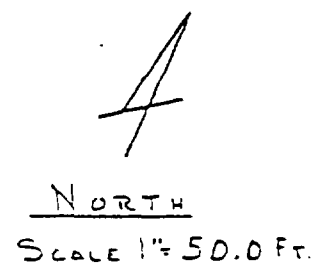
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
R. J. Jones, Vice President	R. J. Jones	9-22-81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

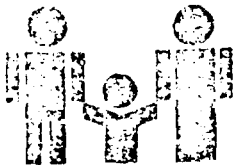


3114-3116 CULLMAN AVE.
CITY OF CHARLOTT
- COUNTY OF MECKLENBURG
NORTH CAROLINA

PAGE 5 OF 5

Detrex Chemical Industries Inc.
3114 Cullman Ave.
Charlotte, N.C. 28206





Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

November 25, 1981

Mr. Ron Ossman
Detrex Chemical Industries, Inc.
P.O. Box 5274
Charlotte, NC 28225

Dear Mr. Ossman:

A follow-up inspection conducted on November 19, 1981 indicated that the violations noted on October 8, 1981 had been corrected.

Thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

Sincerely,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

DWS:nlc

cc: Mr. Jerry Rhodes
Mr. Rick Doby





Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

November 23, 1981

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: Jerry Rhodes *JHR*
Environmental Chemist

SUBJECT: Follow-up Inspection
Detrex Chemical Industries, Inc.
P.O. Box 5274
Charlotte, NC 28225
EPA ID #NCD049773245
Contact: Ron Ossman, Branch Manager

A follow-up inspection was conducted at Detrex Chemical Industries, Inc. on November 19, 1981. The four violations noted during the initial inspection on October 8, 1981 had been corrected. I recommended the written inspection schedule more closely follow paragraphs 265.174 and 265.194. The Charlotte facility of Detrex Chemical Industries, Inc. is now in compliance with RCRA Interim Status Standards.

JR:lc

cc: Mr. Rick Doby



STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Division of Health Services

JAMES B. HUNT, JR.
GOVERNOR

SARAH T. MORROW, M.D., M.P.H.
SECRETARY

P. O. Box 2091

Raleigh 27602

XXXXXXXXXXXXXXXXXXXX
XXXXXXXXXX

Ronald H. Levine, M.D., M.P.H.
State Health Director

November 2, 1981

Mr. Ron Ossman
Detrex Chemical Industries, Inc.
P.O. Box 5274
Charlotte, NC 28225

704-372-9280

Dear Mr. Ossman:


On October 8, 1981, Mr. Jerry Rhodes of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. The following violations were noted:

1. Security: No danger sign at entrances (265.14(c)).
2. Inspection Requirements: No written inspection schedule or log (265.15(b) & (d)).
3. Personnel Training: No documentation (265.16).
4. Closure Plan: No cost estimate (265.112).

A compliance date of November 9, 1981 was established.

If you have any questions concerning this matter, please contact Mr. William Paige, Environmental Chemist, at (919) 733-2178.

Sincerely,


O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: Mr. Rick Doby
Mr. Jerry Rhodes



STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Division of Health Services

JAMES B. HUNT, JR.
GOVERNOR

SARAH T. MORROW, M.D., M.P.H.
SECRETARY

P. O. Box 2091

Raleigh 27602

XXXXXXXXXXXX
XXXXX
DIRECTOR

Ronald H. Levine, M.D.
Acting Director

October 21, 1981

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: Jerry Rhodes *JRH*
Environmental Chemist

SUBJECT: Interim Status Inspection
Detrex Chemical Industries, Inc.
P.O. Box 5274
Charlotte, NC 28225
EPA ID #NCD049773245
Contact: Ron Ossman, Branch Manager

An RCRA Interim Status compliance inspection was conducted at Detrex Chemical Industries, Charlotte facility on October 8, 1981. The following violations were identified:

- (1) Security: No danger sign at entrances (265.14(c)).
- (2) Inspection Requirements: No written inspection schedule or log (265.15(b) & (d)).
- (3) Personnel Training: No documentation (265.16).
- (4) Closure Plan: No cost estimate (265.112).

Mr. Ossman agreed to a compliance date of November 9, 1981.

RCRA INSPECTION REPORT

1. Facility Information

Detrex Chemical Industries, Inc.
Gold Shield Division
3114 Cullman Avenue
P.O. Box 5274
Charlotte, NC 28225
Mecklenburg County
EPA ID #NCD049773245

2. Responsible Official

Ron Ossman, Branch Manager (704) 372-9280

3. Survey Participants

Ron Ossman, Branch Manager
Mark Teal, Office Manager
Jerry Rhodes, Environmental Chemist, DHR

4. Date of Inspection

October 8, 1981
8:30 - 11:30 AM

5. Applicable Regulations

40 CFR Parts 262, 263, and 265; FR May 19, 1980 and amendments

6. Purpose of Survey

An RCRA Interim Status compliance inspection was conducted at the Detrex Chemical Industries, Gold Shield Division, Charlotte site by the N.C. Solid and Hazardous Waste Management Branch. The scope of the inspection was comprehensive including a record review and site survey. Regulatory requirements covered those contained in 40 CFR Parts 262, Generator Standards; 263, Transporter Standards; and 265, General Facility Standards including containers and tanks.

7. Facility Description

Detrex Chemical Industries Gold Shield Division site in northeast Charlotte is located at 3114 Cullman Avenue. This short street (a dead end) is two blocks east from the intersection of Tryon (Highway 29) and 36th streets. This intersection is a few blocks south of the intersection of Tryon Street with Sugar Creek Road. The Detrex site occupies slightly less than one acre.

This facility is primarily a warehouse and distributor of industrial solvents. As a service to their customers they pick up drums of spent halogenated solvents (F001), transport these into the Detrex warehouse, and distill off the good solvents for resale. Solvents handled are 1,1,1-trichloroethane (U226), perchloroethylene (U210), and trichloroethylene (U228). The spent solvents are received in 55 gallon drums and transferred to 1000 gallon storage tanks within days. The still is operated about 4 or 5 days each month to recover the good solvent. The still and all spent solvent storage tanks are inside the warehouse. Recovered solvents are pumped directly from the still to outside storage tanks in a diked containment area. Still bottoms (F002) are pumped into a fourth 10,000 gallon storage tank in the same containment area.

No still bottoms have been shipped off-site. A disposal site now under consideration is Southeastern Waste Treatment, Dalton, Ga. EPA ID #GAD000222083.

Detrex has a permit from the Dept. of Labor (128728) for the steam boiler to the solvent distillation unit. This still is listed on the Part A but should not be required as it is used for beneficial recovery.

8. Documentation of Site Deficiencies

Detrex Chemical Industries appear to be knowledgeable of RCRA and other EPA regulations. Mr. Ossman is informing and aiding his customers in complying to RCRA regulations. However, the following deficiencies were observed.

- (1) No danger signs at the spent solvent storage and distillation area (265.14(c)).
- (2) No written inspection schedule or log (265.15).
- (3) No documentation of personnel training (265.16).
- (4) No cost estimate in the closure plan (265.112).

9. Compliance Schedule

Mr. Ossman agreed to a full compliance date of November 9, 1981.

INSPECTION FORM FOR INTERIM STATUS STANDARDS FOR
OWNERS/OPERATOR OF HAZARDOUS WASTE MANAGEMENT
FACILITIES

Detrox Chemical Industries NC D049773245 Mecklenburg
Name of Site EPA I.D. County
Charlotte Ronald D. Ossman
Location Signature of Facility Contact
10-8-81 Jerry Phoebe
Date Signature of Inspector(s)

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

	<u>C</u>	<u>NC</u>	<u>NA</u>	<u>Violation(s)</u>
1. GENERAL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. GENERAL FACILITY STANDARDS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>265.14(c)</u> <u>265.15</u> <u>265.16</u>
3. PREPAREDNESS AND PREVENTION	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. GROUND-WATER MONITORING	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. CLOSURE AND POST-CLOSURE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>No cost</u> <u>estimate</u>
8. FINANCIAL REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
9. USE AND MANAGEMENT OF CONTAINERS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. TANKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. SURFACE IMPOUNDMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
12. WASTE PILES	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
13. LAND TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
14. LANDFILLS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
15. INCINERATORS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
16. THERMAL TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
17. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
18. UNDERGROUND INJECTION	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

G. T. J. D. F.

Imminent hazard

Explain _____

YES

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NO

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RCRA INSPECTION SUMMARY